

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MUSALLI FACTORY FOR GOLD  
& JEWELLRY CO.,

Plaintiff,

-against-

JPMORGAN CHASE BANK N.A., CHASE  
INVESTMENT SERVICES CORPORATION,  
and NICHOLAS GAMBELLA.

Defendants.

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
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DATE FILED: 7/28/08

1:08-cv-01720 (LAP)

STIPULATION REGARDING  
TIME TO RESPOND TO THE  
AMENDED COMPLAINT  
AND A STAY OF DISCOVERY

WHEREAS, pursuant to this Court's Order of May 12, 2008, plaintiff filed its the  
amended complaint on May 30, 2008; and

WHEREAS, pursuant to this Court's Order of May 12, 2008, the parties have  
conferred and agreed with respect to a briefing schedule for defendants' contemplated  
motion to dismiss the amended complaint;

WHEREAS, there has been no prior request for adjournment of the time to  
answer or otherwise respond to the amended complaint;

WHEREAS, the parties have conferred and agreed that they wish to postpone  
initial disclosures and discovery until after the Court's decision on the motion to dismiss  
and, in the event that the motion is denied in whole or in part, the parties will confer  
pursuant to Fed. R. Civ. P. 26(f) on or before thirty days after the Court's ruling on the  
motion to dismiss; and

THEREFORE, it is hereby Stipulated and Agreed that:

1. Defendants shall respond to the amended complaint by motion to dismiss or answer on or before July 25, 2008;

2. If defendants move to dismiss the amended complaint, plaintiff shall serve its opposition to defendants' motion to dismiss on or before September 5, 2008;

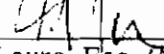
3. Defendants shall serve reply papers to plaintiff's opposition on or before September 26, 2008;

4. Initial disclosures and discovery shall be postponed until after the Court's decision on the defendants' motion to dismiss;

5. In the event that the motion to dismiss is denied in whole or in part, the parties shall confer pursuant to Fed. R. Civ. P. 26(f) on or before thirty days after the Court's ruling on the motion to dismiss.

Dated: New York, New York  
June 13, 2008


THE LAURO LAW FIRM

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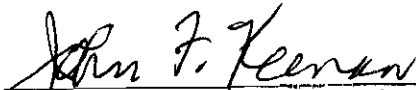
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*Attorneys for Defendants*

So ordered this 28 day of June, 2008.



Hon. Loretta A. Preska  
United States District Judge

for